

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

ORLANDO SANCHEZ ECHEVARRIA

DEBTOR

CASE NO. 20-03964 MCF

CHAPTER 13

**DEBTOR'S OPPOSITION TO *TRUSTEE'S MOTION REQUESTING
ENTRY OF ORDER TO INFORM*, DOCKET #59**

TO THE HONORABLE COURT:

NOW COMES, ORLANDO SANCHEZ ECHEVARRIA, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 15, 2022, the Chapter 13 Trustee filed a *Trustee's Motion Requesting Entry of Order to Inform*, docket #59, stating that as per Schedule I of the Bankruptcy Petition the Debtor is employed by "Camara de Representantes ELA", that "...since a series of government employees will be receiving a special bonus between \$2,954.00 and \$11,360.00..." and this "...bonus constitutes property of the estate and disposable income..." the Trustee requests the Court to enter an order for the Debtor to inform whether the Debtor received said bonus, the amount received and when the Debtor would be submitting the same to fund the Plan. *Trustee's Motion requesting Entry of Order to Inform*, at paragraphs 2 and 6, docket #59.

2. The Debtor respectfully opposes the Trustee's request entry of Order (docket #59) on the grounds that on December 12, 2022, the Debtor did inform to the Chapter 13 Trustee that on December 1, 2022 the Debtor received the sum of \$2,521.24 as a "special bonus" and that the Debtor is requesting authorization for the use of these funds to cover "reasonable and necessary" household/family expenses. See: *Debtor's Motion Requesting*

Entry Order Re: Authorization to Use Funds from Government Special Bonus, docket #58.

3. That the Debtor sent to the Chapter 13 Trustee the unused portion of the “special bonus”, a payment in the sum of \$500.00 to fund the Debtor’s confirmed Plan.

4. As of the present date, December 19, 2022, the Chapter 13 Trustee nor any other party has objected to the Debtor’s request for the authorization for the use of the funds from the “special bonus”, docket #58.

WHEREFORE, the Debtor respectfully requests from this Honorable Court to grant the present motion and deny the *Trustee’s Motion Requesting Entry of Order to Inform*, docket #59, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtor to his address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 19th day of December 2022.

/s/Roberto A. Figueroa Colón
ROBERTO A. FIGUEROA COLON
USDC #300105
ATTORNEY FOR DEBTOR

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